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The Dickerson Area Facilities Implementation Group (DaFIG) is opposed to those portions of County Bill 21-09 which call for the elimination of DaFIG and the incorporation of DaFIG's activities and responsibilities into those of the Solid Waste Advisory Committee (SWAC). We are joined in this by the Dickerson Community Association, Inc., and the Sugarloaf Citizens Association.

The FIG purpose is: "To address community and environmental issues and concerns" associated with implementing the Dickerson Area Solid Waste Facilities Implementation Master Plan (County Council Resolution No. 13-1498, adopted 12/1/98.) FIG was created from a Landfill Working Group with then Chair of the T&E Committee, Isiah Leggett, and the committee recognizing the need for regular, continuing input and advice from the **residents of the affected community**. The need for this input was evident because of the tremendous local concern and opposition of Upcounty residents to the proposed Site 2 Landfill. SWAC is primarily concerned with the County's disposition of its massive municipal solid waste stream. It is unrealistic to expect SWAC to share Upcounty's concerns when they are so far removed from facility implementation and operational issues that affect Dickerson area residents day in and day out.

We can understand the perceived savings associated with folding DaFIG's responsibilities into those of SWAC, but believe it would obfuscate the role and concerns of the community affected by Dickerson area facility operations. DaFIG's mission is not just about advising the County on the operation of the facilities that manage solid waste. DaFIG is also the County's front line of defense for the recognition of environmental impacts of the County's facilities that could lead to serious environmental liabilities. Consequently, DaFIG and SWAC have very different and distinct purposes and missions, requiring a very different membership.

Because of the institutional context within which DaFIG was created and shaped, abandoning it now would be a tremendous waste of County and community resources, and would send a very negative signal with regard to the County's interest in the concerns of its Upcounty residents. Of special concern to DaFIG is ensuring that the County's Upcounty facility operations do not adversely affect the USEPA-designated Sole Source Aquifer that underlies the Upcounty, and upon which all Upcounty residents rely for their basic water needs. To that end, DaFIG has participated in ongoing studies of solid waste facility-generated air and non air contaminants in the environment (milk, grass, fish, silt, etc.). These studies constitute a longitudinal assessment of the presence of environmental contaminants such as hydrochloric and sulfuric acids, and compounds of barium, chromium, copper, lead, manganese, mercury, nickel, vanadium, zinc and more.

The importance of monitoring and maintaining a record of these potential hazards and environmental liabilities is critical to a part of the County upon which the County has imposed some of its most environmentally intrusive land uses. These include the Resource Recovery Facility where all of the County's solid waste refuse is brought for incineration, the Compost Facility where all of the County's grass, leaves and yard trim are brought for decomposition, and the as yet undeveloped (and hopefully never

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developed) Site 2 Landfill property that hangs like an anvil over the heads of local residents. In addition one of the largest coal-fired power plants in the state is collocated with the County's facilities in Dickerson. Environmental concerns associated with these facilities highlighted by the recent coal ash storage accidents at Tennessee Valley Authority power plants, and the Washington Post article of May 3, "EPA seeks Rules for Utilities' Runoff," show the growing need for close monitoring to safeguard the health and welfare of those most directly affected (i.e., Upcounty residents). It is DaFIG which has championed the monitoring of these facilities to protect the health and welfare of the affected community and avoid the County's potential environmental liabilities that could result from turning a blind eye to these growing environmental concerns.

The SWAC can not, and will never, have the institutional history to do so without considerable expansion or restructuring. It makes no apparent sense to add to SWAC's charge, work that would be largely unrelated to their central mission and for which they are unprepared to diligently pursue.

Likely lost or severely diminished if SWAC attempts to assume the role of DaFIG are the purpose, need for, and outcome of:

- longitudinal measurements of air pollution and the effects of particle deposition (e.g., contamination of grasses, vegetables, milk, and fish);
- longitudinal measurements of non-air deposition (e.g., contamination of surface and ground water);
- oversight of county management of leased properties on and adjacent to the Site 2 Landfill property;
- regular, in-depth review of facility data, including equipment failures at the Resource Recovery Facility incinerator which potentially add to emissions affecting the local community (over 90 such failures occurred in 2006); and
- informed and insightful input from the affected community into the newly developed Environmental Management System for the Resource Recovery Facility, including their environmental management program's goals and objectives.

All of these items involve scientific/engineering aspects that are greatly enhanced by the history and expertise DaFIG members have accumulated over the years. That institutional knowledge is not present in SWAC.

If the County still believes the mission of DaFIG is important, and we note that the 2004 CERB report recommended continuing DaFIG, then most of the scientific and engineering work of DaFIG needs to be continued. It is our view that the County would be irresponsible, in light of what we know and are only now learning, to discontinue this work. And who better to oversee that work than local residents who care and who have developed a body of knowledge and background?

The message that would be sent by eliminating DaFIG, whether intended or not, is that the County does not care about the views of Upcounty residents regarding the health risks and environmental liabilities posed by the County's Dickerson area facility's, including

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the potential threats to the sole source aquifer upon which Upcounty residents depend. Such a message would be politically reckless and environmentally unwise.